

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI

UNITED STATES OF AMERICA

VS.

CASE NO. 1:15cr00098-SA-DAS

JAELYN YOUNG

MOTION TO EXTEND THE MOTION DEADLINE

COMES NOW Jaelyn Young, by and through counsel, and files her Motion to Extend the Motion Deadline as follows:

1.

The Motion deadline is currently scheduled for September 22, 2015. The discovery deadline was originally scheduled for September 15, 2015, but was extended until September 18, 2015. On September 18, 2015, the Government provided some discovery on an electronic disk. However, this discovery consisted, in part, of a hard drive, which the undersigned counsel will have to download and review. Furthermore, the Government's discovery is not complete, as the Government does not yet have a copy of a computer forensic expert report.

2.

In addition, the Government has also informal counsel that there are other discovery items that are not susceptible to copying, which will be made available for inspection at a mutually convenient time. However, the Government has also informed counsel that there are items that the Government does not presently have in their possession that will have to be obtained via subpoena from third parties. The Government has agreed to furnish copies of such subpoenaed materials, once they are available to the Government.

3.

Because discovery is not yet complete, Defendant respectfully submits that the Motion deadline should be continued. Defendant requests that the Motion deadline be extended until 30 days after the Government has completed its discovery to the Defendants.

4.

Counsel for the Government has not yet responded to Defendant's inquiry as to whether the Government has an objection to this request.

WHEREFORE, PREMISES CONSIDERED, Defendant respectfully requests that the Motion deadline in this case be extended until 30 days after the Government completes its discovery to the Defendants.

Defendant requests such other more general relief as may be just and proper in the premises.

This the 22nd day of September, 2015.

Respectfully submitted,

JAELYN YOUNG

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BY: /s/ Kenneth H. Coghlan
KENNETH H. COGHLAN
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CERTIFICATE OF SERVICE

I, KENNETH H. COGHLAN, of Rayburn Coghlan Law Firm, PLLC, Oxford, Mississippi, do hereby certify that on the 22nd day of September, 2015 I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to the following: clay.joyner@usdoj.gov; bob.norman@usdoj.gov; and greg_park@fd.org.

/s/ Kenneth H. Coghlan

KENNETH H. COGHLAN